

Bove, Emil (USANYS)

From: Beverly Van Ness <bvanness.law@gmail.com>
Sent: Monday, March 20, 2017 1:51 PM
To: Bove, Emil (USANYS); Laroche, Matthew (USANYS)
Subject: discovery status, Lopez-Flores

Dear Emil, thanks for your email today, and putting together the joint status letter.

On behalf of Mr. Lopez-Flores, what we believe to be outstanding discovery matters are detailed in our reply memorandum (ECF #101). This encompasses our requests for a bill of particulars as to our client's and his codefendants' involvement in the narcotics conspiracy, and Mr. Lopez-Flores' possession of a firearm (we do not seek information about each overt act committed in furtherance of the conspiracy committed by everyone involved), and the names of his alleged co-conspirators -- subject to an appropriate protective order if need be (ECF #101, pp. 3-4). We also seek certain Giglio material earlier than close to the start of trial (id., pp. 5-6). Finally, we have asked for much of the information the government has sought from the Honduran authorities pursuant to its MLAT letter, whenever such material is supplied (id., pp. 4-5).

If you would like me to detail our requests more particularly, let me know. Beverly